## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

TRISURA INSURANCE COMPANY	§	
Plaintiff,	§	
	§	
vs.	§	Civil Action No. 23-cv-11053
	§	MOTION TO EXTEND TIME TO
BIGHORN CONSTRUCTION AND	§	FILE ANSWER THE AMENDED
RECLAMATION, LLC, BIGHORN	§	COMPLAINT
INVESTMENTS AND PROPERTIES,	§	
LLC, BIGHORN SAND & GRAVEL LLC,	§	
BRIDGELINK COMMODITIES LLC,	§	
BRIDGELINK ENGINEERING LLC,	§	
BRIDGELINK INVESTMENTS, LLC,	§	
BRIDGELINK RENEWABLE ENERGY	§	
DEVELOPMENT LLC, BRIDGELINK	§	
RENEWABLE ENERGY INVESTMENTS	§	
LLC; INTERMOUNTAIN ELECTRIC	§	
SERVICE, INC., COLE WAYNE	§	
JOHNSON, CORD HENRY JOHNSON,	§	
AND CASSIE HAMILTON,	§	
Defendants.	§	

Defendants, Bighorn Construction And Reclamation, LLC, Bighorn Investments And Properties, LLC, Bighorn Sand & Gravel LLC, Bridgelink Commodities LLC, Bridgelink Engineering LLC, Bridgelink Investments, LLC, Bridgelink Renewable Energy Development LLC, Bridgelink Renewable Energy Investments LLC, Intermountain Electric Service, Inc., Cole Wayne Johnson, Cord Henry Johnson, Cassie Hamilton, (collectively, the "Defendants"), by and through their attorneys Kearney, McWilliams & Davis, PLLC, hereby file this Motion to Extend Time to Answer the Amended Complaint (the "Motion") filed on January 10, 2024 [009] (the "Complaint"). Defendants respond to the Complaint as follows:

Briefly, the undersigned engaged with Bighorn Construction And Reclamation, LLC, Bighorn
 Investments And Properties, LLC, Bighorn Sand & Gravel LLC, Bridgelink Commodities
 LLC; Bridgelink Engineering LLC, Bridgelink Investments, LLC, Bridgelink Renewable

Energy Development LLC; Bridgelink Renewable Energy Investments LLC, Intermountain

Electric Service, Inc., Cole Wayne Johnson, Cord Henry Johnson, Cassie Hamilton,

(collectively, the "Defendants") to file an answer in this matter a few days ago because

Defendants' original sought out counsel was not able to handle the matter.

2. Undersigned counsel engaged in dialogue with counsel for Opposer on March 19, 2024,

regarding an extension to file an answer.

3. Opposing counsel stated they would need to confirm with Plaintiff and stated that an email

was sent to Plaintiff to request an extension of time be granted and did not have a phone number

to reach the Plaintiff at.

4. At the time of this Motion, Plaintiff nor its counsel has not provided an indication one way or

the other. Although Plaintiff or counsel may yet at the last minute provide its consent,

Defendants no longer have the luxury to wait.

5. Defendants believes in good faith that an additional 14 days will provide the parties more time

to answer the Complaint, not for delay but so that justice may be done.

Dated: March 19, 2024

By: /s/ Vikesh N. Patel

Vikesh N. Patel

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Attorney for Defendants

Pending Admission Pro Hac Vice

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this 20th day of March 2024, a true and correct copy of the foregoing instrument was served on all parties and counsel of record in accordance with the Federal Rules of Civil Procedure.

/s/ Vikesh N. Patel

Vikesh N. Patel